Central Criminal Police Department

Request for investigation

The author of the request for investigation

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Assisted in the drafting

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Possible factors Markku Tervahauta, Director General of the National Institute for Health and Welfare Pekka Rissanen, Director of the Department of Health and Welfare Mika SalminenHealth Health , Director of the Department of , Director of the Department of and and Welfare WelfareTiina Laatikainen

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Request for investigation Pekka Kari respectfully requests that the Finnish Central Criminal Police investigate whether Markku Tervahauta, Pekka Rissanen, Mika Salminen, Tiina Laatikainen and other persons identified in the investigation, alone or together with other persons, have committed a breach of official duty, negligent breach of official duty, abuse of official position, aggravated abuse of official position, health offence, marketing offence and/or other offences in the following case. Pekka Kari calls for the perpetrators to be punished.

1. Breach of duty

RL 40:9
1.11.2020 - 01.02.2022 Helsinki

EU legislation requires not only vaccine companies, but also national competent authorities (such as the THL) and the EMA to follow various monitoring processes after a product has been granted a conditional marketing authorisation. In the process, conditional marketing authorisation EU countries are in particular responsible for monitoring the collection of data on suspected side effects.[1]

The THL has probably failed to fulfil its duties under Section 2 of the THL Act, which include, among other things, *researching problems affecting the well-being and health of the population and the prevalence of problems, and developing measures to promote well-being and health and to reduce problems; developing and directing health care activities; conducting the fieldresearch in ; maintaining files and registers in the field; and maintaining the knowledge base in its field of activity*.

Fimea and THL do not know the total number of serious adverse reactions . adverse events or even caused by coronary vaccinesFimea has stated that it is not even possible to determine the total number (K4). According to the information received from the THL, the THL has no information on the total number or prevalence of adverse reactions to coronary vaccines in Finland, nor has there been any comprehensive mapping of the prevalence of adverse reactions in Finland. statement by the THL registry officeAccording to a , if the wanted THL information on the number of adverse events, it would have to search for them in the health care registers on an adverse event-by-event basis (K1).

Based on the), there is body in information provided by Fimea and THL (no Finland K1, K4that has information on national the number of deaths from .coronary vaccines

[1] European Commission: https://ec.europa.eu/info/live-work-travel-eu/coronavirus-response/safe-covid-19-vaccines-europeans/questions-and-answers-covid-19-vaccination-eu_fi

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the number of adverse reactions or even the number of serious adverse reactions or harm to children. According to Fimea, no on adverse reactions information is automatically entered register into any from which a regulatory body could obtain information on the total number of adverse reactions (K4.) The THL, on the other hand, has publicly stated that it can monitor the safety of coronary vaccines and adverse reactions to vaccines on the basis of registers. The YLE news item claimed, on the basis of statements by the THL, that information from the registers was available in near real time and that the THL would obtain information on adverse events from the national social and health register.[2] However, it is clear from the THL's own statement that the THL does not obtain information on the number of adverse events in the way described in the article.

THL and Fimea have not provided any guidance on a harmonised procedure on, for example, which adverse events should be reported or recorded by which party and where, i.e. whether the suspected adverse event should be reported by the patient or by a healthcare professional and whether the adverse event should be reported to Fimea, Omakanta, Avohilmo, another healthcare register or not, i.e. for example, a suspected vaccine adverse event may be recorded in the text section of Omakanta, but not in any statistical database. For example, a suspected adverse reaction does not need to be recorded anywhere by the doctor treating the patient, and there are no national instructions for health care staff to record suspected adverse reactions to vaccines anywhere. According to Fimea, reporting to healthcare professionals is voluntary and Fimea last instructed healthcare professionals on reporting in 2017. There is no specific call or instruction to report adverse reactions to coronary vaccines with conditional marketing authorisation. Information on suspected or confirmed from the databases vaccine adverse reactions would not be automatically transmitted to Fimea (K4.)

The above has led to an arrangement whereby, in order to obtain information on the total number and quality of adverse events and to be able to investigate the link between adverse events and the vaccine, the THL should alsoits own declaration (, according to), collect data from health care registers on an adverse event-by-event basis. Fimea can investigate the type of adverse reactions to a vaccine on the basis of the reports it receives, but Fimea is not in a position to investigate adverse reactionsK1the frequency or total number of , as Fimea's role is to investigate causal links and not quantities, and Fimea's guidelines state that only new types of adverse reactions should be reported to Fimea. It is probably not even possible to determine the total number of adverse reactions to vaccines ex post, as no authority can have the resources to

[2] https://yle.fi/uutiset/3-12208587

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start goingthrough health records to look for vaccine adverse reactions one by one. Also, according to information from Fimeaadverse reactions , it is impossible to identify the number of (K4).
Section 2 of the THL Act requires that the THL should have instructed the health care system to report all adverse reactions it becomes aware of to a single register that can be used to generate statistics and examine the quantity and quality of . adverse reactionsThe persons have failed to instruct health care providers nationwide to report possible vaccine adverse reactions so that the THL could investigate them in accordance with its obligations under the European Commission's guidelines and the conditions laid down in EU legislation.responsible for the operation of the National Institute for Health and Welfare

The THL's actions have thwarted the possibility of having the adverse effects of coronary vaccinations properly recorded, tracked and studied. This has led to a situation where citizens are also unable to assess the risks and safety of vaccines and thus base their decision to receive a vaccine or booster doses on up-to-date factual information. In the spring of 2022, it was found that there had been a significant increase in excess mortality, unrelated to coronary deaths, since the introduction of coronary vaccines (K2)[3]. THL does not know the cause of the excess mortality.

Taking into account the impact of the coronary heart disease pandemic on Finnish society over the past two and a half years, the significant number of adverse reactions to coronary vaccines reported to Fimea, the European Commission's guidance and EU legislation on pharmacovigilance, the THL's Rules of Procedure, the Communicable Diseases Act and the Health statutory duties of the Institute Institute Act, the Health and Welfare Institute has failed to fulfil its statutory duties. Coronary vaccines are medicinal products with a conditional marketing authorisation, the safety of which the manufacturer did not have comprehensive information on either, while safety studies were still partly in progress. as defined by the and Welfare **THL has had a strong obligation to have up-to-date information on the effects of the vaccine, the adverse effects and the extent of these effects.**

Annex of 2 the Institute's Rules of Procedure sets out the Institute's statutory tasks and the departments responsible for them. According to Annex 2 to the Rules of Procedure of the National Institute for Health and Welfare, the THL must comply with Sections 44 and 51 of the Communicable Diseases Act (which require the THL to conduct research to develop a vaccination programme and to monitor the safety of vaccines vaccines and

[3] See also the news on the subject: https://www.iltalehti.fi/kotimaa/a/600002bc-f211-45eb-a268-834fd91716d9

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take action vaccine or vaccine adverse reactions found or suspectedto investigate the). By 2020-2021, THL had produced only one working paper on . vaccination of THL has neglected to conduct follow-up studies coronary vaccines.adolescentson the safety of

The distribution of responsibilities within the THL is shown in the rules of procedure of the National Institute for Health and Welfare. According to Section 4.1 of the Rules of Procedure of the Institute for Health and Welfare, the Institute is headed by the Director-General, who is directly responsible to the Heads of Department, the Directors-General, the Director of Communications and the Director of the Data Licensing Authority, as set out in Annex 5. The Director-General has delegated the statutory tasks entrusted to the Agency to the Heads of Department as set out in Annex 2.

The Director General of THL is Markku Tervahauta. According to § 3 of the THL Act, the Director General Markku Tervahauta is responsible for deciding on matters that are not prescribed or laid down in the rules of procedure for another person employed by the institution. According to Annex 2 to the Rules of Procedure, the statutory tasks of the Institute for Health and Welfare Act are delegated to the Information Services and Public Health Solutions Division. According to Annex 1 to the Rules of Procedure, Pekka Rissanen is Head of the Information Services Department and Tiina Laatikainen is Head of the Public Health Solutions Department. According to Annex 2, the statutory tasks of the Communicable Diseases Act are delegated to the Health Security Division. According to Annex 1 of the Rules of Procedure, Mika Salminen is the Head of the Health Security Division. Tervahauta, Rissanen, Laatikainen and Salminen are therefore responsible for failing to comply with the statutory duties of the National Institute for Health and Welfare (set out below) and are suspected, individually or jointly, of misconduct in office, negligent misconduct in officeoffice, abuse of , gross misconduct in office or any other possible criminal offence.

2. Breaches of duty

RL 40:9
1.10.2021 - 31.3.2022

The persons under investigation are likely to have committed several breaches of official duty by failing to reply to and issue an appealable decision on Dr Kettunen, M.Sc., M.Sc. and formerly by Docent requests for documents , and by sent to the Registry by THL Pauli Rautiainenconcealing some of the documents covered by the Publicity Act.

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slide numbers 6659/3.10.00/2021, 262/3.10.00/2021 and 261/3.10.00/2021 (K5, K6 and K7). Heini Kettunen, M.Sc. (Econ.), OTM, has sent a request for a reply and two requests for documents under the Public Access Act to the THL Registry. The THL Registry stated that the requested documents are confidential and indicated that it would forward the appealable decisions as soon as possible (K5, K6). Despite repeated requests for decisions, no appealable decision has been sent.

In case 262/3.10.00/2021 Kettunen, M.Sc. (E.Sc.), M.Sc. (E.Sc.) requested to receive, among other things, the documents and other documentary material () on which the THL risk score table was basedKettunenK5.Docent Pauli Rautiainen had requested the already in autumn 2021 same documents and had been answered on 1 October 2021 *"the table, which Unfortunately, no memo or bibliography or other document has been prepared in connection with would, for example, provide more details on the literature used."* There is communication between THL and STM regarding the risk scorecard, which Mr Rautiainen had asked to receive. The documents had been withheld on the grounds that they were not documents covered by the Public Access Act. No appealable decision had been issued to Mr Rautiainen. On 25 January 2022, Tuuli Karppinen (a lawyer at the THL, replied to Kettunen K7), that no appealable decision had been provided to Rautiainen concerning the withholding of documents, because one had not yet been drawn up and could not therefore be provided to Kettunen. According to Mr Karppinen, the decision was in the process of being signed. However, to date, no appealable decision has been submitted.

In case THL: Dnro 261/3.10.00/2021 Kettunen asked THL to provide material concerning the Nordic Register Survey, which was in THL's possession because THL had participated in the Register Survey (.K6) On 10.2.2022, THL declared the documents confidential, but did not provide an appealable decision on the matter despite the request. date, the THL has not Toprovided an appealable decision, despite a new request for information on .28 February 2022

In case 6659/3.10.00/2021, a reply was first requested from Markku Tervahauda and then from the THL Registry. Neither party replied to the e-mail. After further enquiries, the THL Registry considered that the organisation was not obliged to respond to the requests for reply. A complete failure to reply to communications is not in accordance with the Administrative Code (provisions on good administrative behaviour).

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Section 14 of the Publicity Act requires the authority to make a decision on whether or not to disclose a document within two weeks. The investigation reveals that the officials of the THL, in the performance of their duties, deliberately or at least negligently breached their official duty under the provisions applicable to official acts (Article 14 of the Publicity Act) by failing to issue an appealable decision, first to Mr Pauli Rautiainen in autumn 2021 and then to Mr Kettunen, M.Sc., M.Sc., in cases 261/3.10.00/2021 and 161/3.10.00/2021.

No been indicated for the documents requested and declared secret. grounds for confidentiality haveThe documents must be considered to public under Articles 1, 6 and 7 of the Publicity Act and the of withholdingwithout justification constitutes a breach of the Publicity Act and thus a breach of official duty under Chapter 40, Section 9 of the Code of Administrative Procedure.documents

The Constitutional Committee of the Parliament has drawn attention to problems with the justification and impact assessments of government proposals related to the management of the COVID-19 epidemic, as well as the access of the Parliament to information in 2020-2021. Interest rate restrictions concerning The constitutionality ofinterest rate restrictions has also been addressed by the Chancellor of Justice's review of legality the regulation on and by administrative courts. In general, regulations restricting fundamental rights in the field of management have thus been the subject of considerable interest rate legal criticism. The THL has produced a knowledge base has contributed to the emergence of regulations restricting fundamental rights. The withholding of documents relating to the knowledge base undermines confidence in the correctness of public authority action and contributes to a lack of ex ante control of legislation and the emergence of unconstitutional legislation. The widespread, systematic and repeated failure to withhold public authority documents, probably without justification under the Public Access Act, and the failure to issue appealable decisions so that decisions to withhold documents can be subject to review by the administrative courts, are therefore not minor.

3. Breach of pharmaceutical legislation

Medicines Act 98 and 91 §, KSL 6 and 7 §
1.11.2020 - 01.02.2022

The Finnish National Institute for Health and Welfare has extensively promoted and marketed the coronary vaccine as safe for Finnish citizens through various media channels. The vaccine is not actually known to be safe THL as described above by failing to comply with the statutory

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their obligation to study the adverse effects of these . vaccinesAs stated above, the National Institute for and Welfare has not kept any comprehensive register or carried out any research into the adverse effects of coronary vaccines and their prevalence in Finland. In addition, since the total number is not known, it is not possible to make any calculationsHealth , for example, on the probability of a person taking the vaccine having a serious adverse reaction. There is unanimous and scientifically validated evidence at national and global level that coronary vaccines cause a variety of adverse health effects in humans. Some vaccine manufacturers and national health authorities in Europe have completely and partially withdrawn coronary vaccines due to adverse health effects. Adverse effects are also largely unidentified, for example the link between the vaccine and menstrual disorders in women was only recently confirmed.

The THL has marketed the vaccine as "safe" despite the fact that the manufacturers had provided the following about the vaccines at the start of the first dosesinformation : no carcinogen studies had, been carried out on the vaccineslittle research had been done on the use of the vaccine in pregnant women, it was not known whether the vaccine was excreted in breast milk, the vaccine had not been tested for interactions with other medicines. Information was available from the vaccine package leaflets[4].

As more information on vaccines and adverse reactions became available, the THL continued to market vaccines as safe. The safety of vaccines for immunocompromised persons, for example, has still not been studied[5] and despite this, the THL has actively encouraged immunocompromised persons to receive vaccine doses earlier than the general population. According to current knowledge, the vaccine can cause relatively serious adverse reactions such as lethargy (nervous hibernation), which has a probability of 1/100 as an adverse reaction to the to 1/1000 vaccineGiven that the THL recommends that a person should take 3-4 doses of the vaccine, even though there is a considerable lack of data on this number of doses, the likelihood of a large number of already identified adverse reactions is so high (e.g. 0.3-4% of vaccine recipients would get lethargy) that the the word 'safe' , and facial paralysis (probability 1/1000 to 1/10000), has already been identified as an adverse reaction in the manufacturers' leaflet (K8)[(6)] use of in marketing is not only misleading within the meaning of Article 6 of the KSL but downright false and gives the impression that the vaccine is not safe.

[4] https://www.ema.europa.eu/en/documents/product-information/comirnaty-epar-product-information_fi.pdf p 4 and p 10.
[5] https://www.ema.europa.eu/en/documents/product-information/comirnaty-epar-product-information_fi.pdf s 4.
[6] https://www.ema.europa.eu/en/documents/product-information/comirnaty-epar-product-information_fi.pdf

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misleadingly give the impression that the vaccine does not cause any negative effects.

THL has continued to market the third and fourth doses of the vaccine as safe, even though the risk of after three doseshas not been determined. In addition, in the summer of 2021, THL has been pushing for the introduction of childhood vaccinations, despite the WHO's recommendation that children should not be vaccinated. At the same time, the THL, both on its website and in its statements, claimed that the WHO recommended vaccinating children (K9 - K10). At that time, the WHO explicitly stated on its website that there was not enough information on vaccinating children and therefore the WHO recommended vaccinating only children at risk myocarditis , for example, (K8). The THL has withheld information on vaccines based on and information from the regulators, and has marketed vaccines as safe and advised all Finns to take 3 .from the public scientific data doses of the vaccine

In accordance with Section 98 of the Medicines Act, the persons found in the investigation have intentionally or negligently violated Medicines Act by marketing a medicinal product. the provisions of theMarketing in breach of the Medicines Act
Section 91, where the marketing did not provide the appropriate information in the summary of product characteristics about possible adverse reactions, but instead marketed the vaccine as safe. marketing of medicinal products Thealso exaggerated the medicinal value of the product, in by conveying to the public the impression that vaccines prevented infections and protected the rest of the population from infections, even though there was no scientific research evidence to support this. In this context, while the THL advertised that the vaccines were very effective in protecting against severe corona infection, the THL did not state that the probability of severe corona infection was almost nil for certain age groups. The persons who provided misleading information, as revealed by the investigation, are likely to have been guilty of conduct constituting a pharmaceutical offence within the meaning of Section 98 of the Medicines Act.breach of Section 91 of the Medicines Act,

Written evidence

Q1: Request for information to THL on 24.11.2021 and THL's reply to the request for information on 1.12.2021
Theme: THL does not know the total number or prevalence of adverse effects of coronary vaccines in Finland.

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K2: Kasper Rönning mortality survey
Theme: Mortality rates have risen since the introduction of coronary vaccines. The rise in mortality cannot be explained by coronary deaths.

K3: THL Rules of procedure with annexes 1-5
Subject: Responsibilities of THL officials for THL's statutory tasks

Q4: Request for information to Fimea in April 2022 and Fimea's replies
Theme: Fimea does not know the total number or prevalence of in Finland, and it is not possible to map these issues.adverse effects of coronary vaccines

K5: Request for documents to THL and replies in case Dnro 262/3.10.00/2021
Subject: THL has failed to issue an appealable decision as required by the Public Access Act.

K6: Request for documents to THL and replies in case Dnro 261/3.10.00/2021
Subject: THL has failed to issue an appealable decision as required by the Public Access Act.

Q7: Email from Tuuli Karppinen to KettuseOTM
Subject: the THL had not yet issued an appealable decision to Pauli Rautiainen in spring 2022 in response to Rautiainen's request for documents in autumn 2021. THL did not issue an appealable decision to OTM Kettunen as required by the Public Access Act.

Q8: Screenshot from the WHO website 21.8.2021
Subject: WHO did not recommend vaccinating children until the August 2021end of .

Q9: THL Facebook in post early autumn 2021
The THL claimed that the WHO had not ruled that should children not be vaccinated.

Q10: Screenshot from thewebsite THL in late summer 2021
THL recommended vaccinating children and in August 2021 started vaccinating 12-17 year olds against the WHO recommendation.

Signature

Done at Helsinki, this .XX day of Xmonth in the year 2022

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Pekka Kari

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